



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 4, 2020

BY ELECTRONIC MAIL

The Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007
(212) 805-0426

Re: United States v. Ziv Orenstein,
15 Cr. 333 (LTS)

Dear Judge Swain:

The Government respectfully submits this letter in response to its order during the sentencing of Ziv Orenstein for the parties to meet and confer regarding the unsealing of various entries on the docket, and further to its communications with Chambers dated November 2, 2020 and earlier today.

The Government and counsel for Orenstein have conferred and respectfully request that the Court maintain the defendant's sentencing submission and the Government's sentencing submission pursuant to Section 5K1.1 of the United States Sentencing Guidelines be maintained under seal, in light of their discussion of the specifics as to Orenstein's cooperation.

The Government further notes that, per its conversation with Chambers, it has already spoken with Jim Molinelli in the Clerk's Office, who has unsealed the S3 Information, the Waiver of Indictment, and a minute entry which notes Orenstein's plea and his conditions of release. As further noted to Chambers, the Government intends to ask the Court to unseal additional items on the docket that relate to Orenstein, once the Court has an opportunity to confirm for the Government what it believes to be the complete list of such entries.

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Accordingly, the Government respectfully requests that the Court maintain all other entries under seal until such confirmation of outstanding docket entries occurs, and the Government has an opportunity to review a complete list of other items that should be considered for public docketing that relate to Orenstein.

Respectfully submitted,

AUDREY STRAUSS

Acting United States Attorney

By: /s/

Eun Young Choi

Assistant United States Attorney

Tel: (212) 637-2187

cc: Alan Futerfas and Ellen Resnick, Esqs. (by e-mail)